

Honorable Mary Alice Theiler

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

TONY LEE WILLIAMS,

Defendant.

CASE NO. MJ19-465

COMPLAINT FOR VIOLATION

21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C)

BEFORE the Honorable Mary Alice Theiler, United States Magistrate Judge,  
Seattle, Washington.

The undersigned complainant, being duly sworn, states:

**COUNT 1**

**Possession with Intent to Distribute Cocaine**

On or about September 30, 2019, in Bellingham, within the Western District of  
Washington, TONY LEE WILLIAMS did knowingly and intentionally possess, with intent  
to distribute, cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and  
841(b)(1)(C).

**COUNT 2**

**Possession with Intent to Distribute Heroin**

On or about September 30, 2019, in Bellingham, within the Western District of Washington, TONY LEE WILLIAMS did knowingly and intentionally possess, with intent to distribute, heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

The undersigned complainant being duly sworn further states:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the Bellingham, Washington Resident Agency, of the Seattle, Washington Field Office. I have been an FBI Special Agent for approximately five years. Prior to that, I was a military intelligence officer for approximately five years. I am an investigative and law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). My duties as a Special Agent include the full-time investigation of a wide range of federal criminal offenses, including violations of the Controlled Substances Act. My responsibilities include overseeing the Northwestern Safe Trails Task Force, which focuses on the investigation of violent crime, narcotics trafficking, and other federal offenses in Northwest Washington's Indian Country. I have received specialized training in the enforcement and investigation of the Controlled Substance Act. I have received classroom training including but not limited to, drug identification, drug interdiction, detection, and the investigation of individuals and/or organizations involved in the illegal possession, possession for sale, sales, importation, smuggling, cultivation, manufacturing and trafficking of controlled substances.

2. Over the last ten years of law enforcement employment, I have received training from the FBI and the U.S. military specific to the identification and investigation of drug related crimes. In my role as a Special Agent for the FBI, I have participated in narcotics investigations involving heroin, fentanyl, cocaine, marijuana, and methamphetamine which have resulted in the arrest of individuals, the seizure of

1 narcotics and/or narcotic-related evidence, and the forfeiture of narcotics related assets. I  
2 have been involved in the service of search warrants as part of these investigations. As a  
3 result of my training and experience, I am familiar with the various tools, methods,  
4 trends, paraphernalia and related articles used by various traffickers in their efforts to  
5 conceal and distribute controlled substances. I am also familiar with the manner in which  
6 drug traffickers use telephones, often cellular telephones, to conduct their unlawful  
7 operations.

8         3. The statements contained in this affidavit are based upon my investigation  
9 and information provided to me by other law enforcement officers. I have not included  
10 each and every fact known to me or other investigative personnel concerning this  
11 investigation. I have set forth only the facts I believe are necessary to establish probable  
12 cause to believe that TONY LEE WILLIAMS has committed the crimes of Possession  
13 with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Sections  
14 841(a)(1) and 841(b)(1)(C), and Possession with Intent to Distribute Heroin, in violation  
15 of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

16                                   **PROBABLE CAUSE**

17         4. At approximately 6:00 PM on September 30, 2019, I received a phone call  
18 from Lummi Nation Police Detective Brandon Gates. Detective Gates informed me that a  
19 suspected overdose death had occurred at a residential address on the Lummi  
20 Reservation. Based on information first responders gathered when they arrived on scene,  
21 first responders attempted to administer overdose medical aid including NARCAN (a  
22 nasal spray used for the treatment of an opioid emergency and/or overdose), but later  
23 pronounced Jane Doe dead. I responded to the Lummi Nation Police Department to  
24 further investigate the matter.

25         5. When Lummi police officers responded to the scene of the overdose, they  
26 located Jane Doe's body in the bathtub, and also located a purse containing Jane Doe's  
27  
28

1 identification card and a blue pill crusher. Inside of the blue pill crusher was a white  
2 powdery residue.

3 6. While at the scene of the overdose, Detective Gates interviewed Jane Doe's  
4 boyfriend, who reported that earlier in the day, Jane Doe had received a light blue "oxy  
5 30" pill from an adult male with the initials N.C. Jane Doe's boyfriend reported that he  
6 and Jane Doe had shared the pill earlier on September 30<sup>th</sup>, sometime between 3:00 P.M.  
7 and 3:30 P.M. He also reported that he believed Jane Doe may have had an extra pill left  
8 over which he believed she likely took after they had shared the first pill.

9 7. After interviewing Jane Doe's boyfriend, Lummi Nation Detectives Gates  
10 and Richard Hart contacted N.C. at another residence on the Lummi Reservation. N.C.  
11 stated that he had given a pill to Jane Doe earlier that day. N.C. then showed detectives a  
12 ziplock bag of pills. N.C. showed the detectives where he had hidden the bag in a truck at  
13 the residence where he was interviewed. Detectives noted that the bag contained 16.25  
14 light blue pills. The pills had an "M" imprinted on one side and the pills were scored on  
15 the other side with a "30" above the score. Based on my training and experience, I know  
16 that Oxycodone Hydrochloride 30 mg pills bear these same markings.

17 8. Detectives transported N.C. to the Lummi Nation Police Department for  
18 further questioning. There, Detective Gates and I advised N.C. of his *Miranda* rights.  
19 N.C. waived his rights and agreed to speak with us. N.C. stated that Jane Doe had  
20 contacted him earlier on September 30 requesting "pills." N.C. reported that he initially  
21 told Jane Doe that he did not have any pills; however, N.C. reported that he contacted  
22 Jane Doe later on September 30, between 12:30 and 1:00 PM, to let her know that he had  
23 some pills. N.C. reported that he told Jane Doe to come to his house. N.C. reported that  
24 when she arrived, N.C. gave her a pill. N.C. said that Jane Doe left shortly afterwards.  
25 N.C. said that later on September 30, a family member called to tell him that Jane Doe  
26 had died.

27 9. N.C. reported that when he learned of Jane Doe's death he hid the bag of  
28 pills in the truck because he knew the police would come to his house. N.C. reported that

1 he had bought the pills in the ziplock bag from an individual at an apartment located at  
2 XXXX Maplewood Avenue in Bellingham (the "Apartment"), earlier in the day on  
3 September 30, 2019. N.C. stated that on three prior occasions over the last two months,  
4 he and his sister had purchased similar pills at the Apartment. N.C. reported that on each  
5 occasion, he remained in his vehicle while his sister went into the Apartment to purchase  
6 the pills. N.C. said that from his vehicle, he was able to view his sister enter the  
7 Apartment. Based on information provided by his sister, N.C. believed that the person  
8 supplying the pills at the Apartment was a black male with the street name "Money."  
9 Initially N.C. was not able to recall the exact address of the Apartment. During his  
10 interview, Detective Gates and I took N.C. out in a car and requested he direct us to the  
11 Apartment where he had purchased the pills. N.C. directed us to the Apartment. Once  
12 there, N.C. identified and confirmed that the Apartment was the location where he and  
13 his sister had purchased pills on each prior, reported occasion.

14 10. On the evening of September 30, 2019, SA Terry Getsch and a Lummi  
15 Detective made contact with N.C.'s sister at her parents' residence on the Lummi  
16 Reservation. N.C.'s sister voluntarily consented to go to the Lummi Police Department to  
17 be interviewed and was provided a ride there. While at the Department, N.C.'s sister was  
18 again advised that she was free to leave, and she consented to being interviewed. During  
19 the interview, N.C.'s sister advised that she was familiar with a black male subject that  
20 went by the name "Money." N.C.'s sister explained that she met Money at the clubs  
21 downtown, and purchased pills from Money on two or three prior occasions.

22 11. According to N.C.'s sister, the first time she purchased pills from Money  
23 was approximately a month ago, the second time was several weeks later, and the last  
24 time she believed to be on the prior Sunday. N.C.'s sister said that her brother was a  
25 fisherman and had money from fishing. He used her to buy pills because of her  
26 connections and ability to get pills. On the last day she purchased pills from Money,  
27 N.C.'s sister said that she and N.C. drove to the Apartment, but Money was not there, so  
28 she then visited the Apartment later in the evening to find him. N.C.'s sister said that

1 N.C. gave her six \$100 bills. They parked a short way from the Apartment, and she  
2 walked to the Apartment and saw Money outside. N.C.'s sister said that she asked to buy  
3 pills from Money, and bought all 18 pills that Money had in his pocket in a small bag  
4 with \$ signs on it. N.C.'s sister described the pills as small round blue Oxy 30s, and said  
5 she looked up the pills online to make sure they were right. When she tried the pills she  
6 could tell that they were opiates. N.C.'s sister said that she had used approximately one  
7 pill since she purchased them, and N.C. had the rest of the pills. When shown the bag  
8 with the pills that had been seized from N.C., his sister advised that they appeared to be  
9 the same pills that she had purchased from Money.

10 12. N.C.'s sister viewed a digital version of Google maps and identified the  
11 Apartment as located at the Maplewood Apartments off of West Maplewood Ave where  
12 she and N.C. purchased the pills. She described the apartment as a two story apartment  
13 with an interior stair well, and said that Money's apartment was approximately seven  
14 apartment units from the rear of the complex.

15 13. Detective Hart contacted a Whatcom County Deputy to see if he had any  
16 information on an individual in the area by the street name of "Money." The Deputy is a  
17 member of the County Interdiction Team. This is a team that specializes in drug  
18 investigations and interdiction. The Deputy advised that he knew the name "Money" to  
19 be associated with three individuals that he identified. The Deputy believed one of the  
20 individuals is currently incarcerated, which agents subsequently confirmed. Agents also  
21 confirmed that the second individual did not have any recent contacts with law  
22 enforcement in the local area. The third individual, according to the deputy, was an  
23 individual with the initials G.T.

24 14. I conducted a Washington State Department of Licensing query of G.T. and  
25 the results revealed that his registered address is the Apartment.

26 15. On October 1, 2019, Chief Magistrate Judge Brian A. Tsuchida issued a  
27 search warrant for the Apartment, and agents executed the warrant. Two individuals – an  
28

1 adult female and an adult male – were in the Apartment at the time the warrant was  
2 executed. Neither individual was G.T.

3 16. The male individual was later identified to be TONY LEE WILLIAMS.  
4 Previously, N.C.'s sister had described the person she purchased the pills from the  
5 Apartment from as a male approximately 33 years old, approximately 6ft tall, with  
6 trimmed facial hair around his mouth, and as somebody who often wears a hat or "dew  
7 rag." Agents confirmed that WILLIAMS matched the description of the individual  
8 provided by N.C.'s sister.

9 17. Agents interviewed WILLIAMS and advised him of his *Miranda* rights.  
10 He waived his rights and agreed to speak with us. WILLIAMS advised that he lived in  
11 the back bedroom on the second floor of the Apartment. He further advised that he had  
12 cocaine, heroin, Oxy pills, and a pistol in his bedroom. He said that he found the pistol  
13 and the drugs in the trunk of a Ford Mustang he had recently purchased and that he had  
14 removed them from the Mustang, which he subsequently sold. However, he later changed  
15 his story and said that he only found the pistol, cocaine, and heroin in the Mustang, but  
16 the pills were his and they did not come from the Mustang.

17 18. WILLIAMS advised that he sells the Oxy pills and has been selling them  
18 for a while. He has sold approximately 200 of these pills in total over an extended period  
19 of time. WILLIAMS said he sells the pills for \$25 each. WILLIAMS stated that on  
20 September 30, 2019, he sold pills to at least two bouncers from local nightclubs and to a  
21 female from the Reservation. The first name WILLIAMS provided for the female from  
22 the reservation matches the first name of N.C.'s sister. WILLIAMS said that the female  
23 came to the Apartment earlier that day to buy pills, and he sold her approximately 22  
24 pills. WILLIAMS also said that he saw N.C.'s sister arrive in a vehicle and observed a  
25 male sitting in her vehicle waiting for her while WILLIAMS sold her the pills.

26 19. WILLIAMS further advised that he buys the pills from a man from Mount  
27 Vernon, and that he has known this man for approximately two years. WILLIAMS  
28 reported that he did not know much more about his supplier, other than the supplier's first



1 name (which WILLIAMS provided). WILLIAMS explained that the man comes up from  
2 Mount Vernon and drops off the pills to WILLIAMS at the Apartment.

3 20. WILLIAMS advised that his nickname is "Money" and that he's had this  
4 nickname since he was a teenager. Based off my training and experience, I know that it  
5 is common for drug dealers to use the moniker "Money" and it is not a nickname that is  
6 unique to one person.

7 21. Among other things, agents seized from the back bedroom on the second  
8 floor of the Apartment approximately 38 grams of a white powder of suspected cocaine,  
9 which field tested positive for the presence of cocaine, approximately 8 grams of  
10 suspected heroin, which field tested positive for the presence of heroin, approximately 30  
11 Oxy pills, a spoon with dark residue, two Digi Weigh scales with residue, a 100 round  
12 box of Remington 380 rounds that had 91 rounds in it, a pistol magazine with 380 rounds  
13 in it, and a 380 semi-auto Super Titon pistol with the serial number removed.

14 //

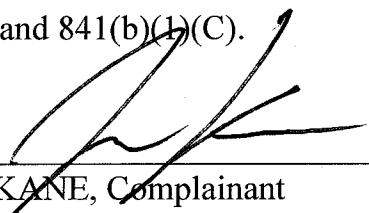
15 //

16 //



CONCLUSION

21. Based on the foregoing, I respectfully submit there is probable cause to believe that the Defendant, TONY LEE WILLIAMS has committed the crimes of Possession with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(C); and Distribution of <sup>Heroin</sup> ~~Methamphetamine~~, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

  
JACK KANE, Complainant  
Special Agent, FBI

Based on the Complaint and Affidavit sworn to before me, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

DATED this 1 day of October, 2019.

  
MARY ALICE THEILER  
United States Magistrate Judge